

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

NAVIENT SOLUTIONS, LLC

Plaintiff,

v.

THE LAW OFFICES OF JEFFREY
LOHMAN, P.C., *et al.*,

Defendants.

CIVIL ACTION No.1:19-cv-00461

**PLAINTIFF NAVIENT SOLUTIONS, LLC’S MOTION TO FILE UNDER SEAL
CERTAIN MATERIAL DESIGNATED AS CONFIDENTIAL**

Pursuant to Local Civil Rule 5, Plaintiff Navient Solutions, LLC, (“NSL”) respectfully submits this motion for leave to file under seal the unredacted version of NSL’s Opposition to the Lohman Defendant’s Motion for Reconsideration of Summary Judgment and, in the Alternative, for Certification of an Interlocutory Appeal; the unredacted version of the Declaration of George R. Calhoun (“Calhoun Decl.”); and Exhibits 1–8 attached thereto which contain information that NSL has designated for “Confidential” treatment under the Confidentiality Agreement and Protective Order entered on November 20, 2020, Dkt. 71, and the full names of the Lohman Defendants’ former clients.

Unredacted versions of these documents are being filed under seal as Dkts. 407 & 409. The grounds and reasons upon which NSL seeks this relief have been stated with particularity in the accompanying brief. A proposed order is submitted herewith.

DATED: May 26, 2021

Respectfully submitted,

/s/ Jeffrey R. Hamlin

Jeffrey R. Hamlin (Va. Bar No. 46932)

George R. Calhoun V (*pro hac vice*)

IFRAH PLLC

1717 Pennsylvania Avenue NW

Suite 650

Washington, DC 20006-2004

(202) 524-4140 – Tel.

(202) 524-4141 – Fax

jhamlin@ifrahlaw.com

george@ifrahlaw.com

Counsel for Navient Solutions, LLC

CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2021, I will electronically file Plaintiff Navient Solutions, LLC's Motion to File Under Seal Certain Material Designated as Confidential, Memorandum of Law in support thereof, and Proposed Order using the Court's CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.¹

/s/ Jeffrey R. Hamlin
Jeffrey R. Hamlin

¹ A courtesy copy will be delivered to chambers within twenty-four hours in accordance with the Alexandria Division's chambers-copy rules.